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Attorneys for Defendant  
Charles Schwab & Co., Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JACQUELINE ANDERSON,

Plaintiff,

VS.

CHARLES SCHWAB AND COMPANY, INC.,  
and DOES 1 through 100, inclusive,

## Defendants.

No.: 3:12-cv-01682-MMC

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING DEFENDANT CHARLES  
SCHWAB & CO., INC.'S TIME TO  
RESPOND TO COMPLAINT**

*Hon. Maxine M. Chesney*

1 Plaintiff Jacqueline Anderson (“Plaintiff”) and Defendant Charles Schwab & Co., Inc.  
2 (“Defendant”), by and through their undersigned counsel of record, hereby stipulate as follows:

3 WHEREAS, on January 11, 2013, the parties filed a Stipulation and [Proposed] Order  
4 seeking leave for Plaintiff’s filing of a Third Amended Complaint [Doc 19];

5 WHEREAS, on January 15, 2013, this Court granted Plaintiff leave to file a Third Amended  
6 Complaint [Doc. 20];

7 WHEREAS, on January 17, 2013, Plaintiff filed a Third Amended Complaint [Doc. 21];

8 WHEREAS, the Third Amended Complaint contains 270 separate and distinct paragraphs;

9 WHEREAS, Defendant intends to file an answer to the Third Amended Complaint;

10 WHEREAS, the parties stipulated to, and the court granted, an extension of Defendant’s time  
11 to file its answer to March 1, 2013 [Docs. 22, 24]

12 WHEREAS, the parties stipulated to, and the court granted, an extension of Defendant’s time  
13 to file its answer to March 15, 2013 [Docs. 22, 24]

14 WHEREAS, Defendant will be unable to complete its Answer by March 15, 2013;

15 WHEREAS, an extension of time will not affect the case management schedule for this  
16 action; and

17 WHEREAS, the instant Stipulation and [Proposed] Order constitutes the parties’ third  
18 request for a time modification in this action.

19  
20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiff and  
21 Defendant that:

22 Pursuant to this stipulation, the parties agree to continue Defendant’s deadline to file its  
23 responsive pleading to the Third Amended Complaint from March 1, 2013 to March 22, 2013.

24  
25 SO STIPULATED.

1  
2 DATED: March 13, 2013

REED SMITH, LLP

3  
4 By: /s/ Tiffany Renee Thomas

5 Deborah J. Broyles

6 Tiffany Renee Thomas

7 Attorneys for Defendant Charles Schwab & Co., Inc.

8  
9 DATED: March 13, 2013

Law Offices of Murlene J. Randle

10  
11 By: /s/ Murlene J. Randle

12 Murlene J. Randle

13 Attorneys for Plaintiff Jacqueline Anderson

14  
15  
16 ORDER

17  
18 Pursuant to the stipulation of the parties and good cause appearing, IT IS HEREBY  
19 ORDERED THAT Defendant Charles Schwab & Co., Inc. must file a responsive pleading to  
20 Plaintiff Jacqueline Anderson's Third Amended Complaint no later than March 22, 2013. Given the  
21 limited nature of the amendments and defendant's having been aware of said amendments no later  
22 than January 17, 2013, however, such extension shall not constitute good cause to amend the Pretrial  
23 Preparation Order in any manner.  
IT IS SO ORDERED.

Dated: March 18, 2013

24  
25   
The Honorable Maxine Chesney  
United States District Judge